

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x  
:  
UNITED STATES OF AMERICA :  
:  
- v. - :  
:  
DIMITRIS ALIFRAGIS, :  
:  
Defendant. :  
:  
- - - - - x

**INFORMATION**

20 Cr. ~~421~~<sup>ALC</sup>

**COUNT ONE**  
**(Scheme to Defraud a Financial Institution)**

The Acting United States Attorney charges:

1. In or about 2016, in the Southern District of New York and elsewhere, DIMITRIS ALIFRAGIS, the defendant, willfully and knowingly executed and attempted to execute a scheme and artifice to defraud a financial institution, to wit, a mortgage lending business whose activities affected interstate commerce, as defined in Title 18, United States Code, Section 27, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, ALIFRAGIS engaged in a scheme to defraud mortgage lending businesses by inflating his personal assets in order to induce those

businesses to lend him money that they otherwise would not have lent him.

(Title 18, United States Code, Sections 1344 and 2.)

### **FORFEITURE ALLEGATION**

2. As a result of committing the offense charged in Count One of this Information, DIMITRIS ALIFRAGIS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendant personally obtained.

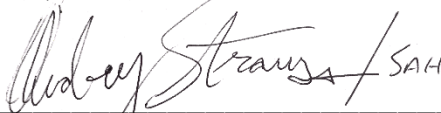
### **Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission by the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code Section 2461, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Section 981(a)(1)(C);  
Title 21, United States Code, Section 853(p);  
Title 28, United States Code, Section 2461.)

  
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AUDREY STRAUSS  
Acting United States Attorney

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(Title 18, United States Code,  
Sections 1344 and 2.)

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